

EXHIBIT “13”

Deposition of Chad Westendorf

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1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF SOUTH CAROLINA
3 CHARLESTON DIVISION

4 DEPOSITION OF CHAD WESTENDORF

5 NAUTILUS INSURANCE COMPANY,

6 Plaintiff,

7 vs. CASE NO. 2:22-cv-1307-RMG

8 RICHARD ALEXANDER MURDAUGH, SR., CORY FLEMING,
9 MOSS & KUHN, P.A., CHAD WESTENDORF, and
10 PALMETTO STATE BANK,

11 Defendants.

12 DEPONENT: CHAD WESTENDORF

13 DATE: JUNE 30, 2023

14 TIME: 1:57 P.M.

15 LOCATION: WALKER GRESSETTE FREEMAN & LINTON
16 CHARLESTON, SC

17 REPORTED BY: RUTH L. MOTT, RPR, CRR
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19 P.O. BOX 73129
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1 A. I would assume.

2 Q. When you were asked to serve as PR for
3 the Estate of Gloria Satterfield, you ran that
4 request by Mr. -- by Russell Laffitte, correct?

5 A. That is correct.

6 Q. Did he tell you anything about any of
7 the wrongdoing associated with serving as a
8 fiduciary for Alex Murdaugh when you asked?

9 MR. GRESSETTE: Objection.

10 A. No, sir.

11 Q. Did he tell you that Murdaugh had
12 substantial overdrafts?

13 A. No, sir.

14 Q. Did Mr. Laffitte tell you that when he
15 was a vice president like you were, he had caused
16 PSB to issue illegal loans to Alex Murdaugh from
17 a conservatorship account?

18 MS. ALLEN: Objection to the form.

19 MR. GRESSETTE: Objection.

20 A. He did not.

21 Q. Did he tell you that funds had been
22 disbursed in prior conservatorships in violation
23 of the disbursement statements approved by the
24 court?

25 A. He did not.

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1 Q. Now, you heard us also talk a little bit
2 earlier about the PR fee that you were paid?

3 A. Yes, sir.

4 Q. And that was \$30,000?

5 A. That's correct.

6 Q. And you refunded that to the
7 Satterfields or you paid that to the Bland
8 Richter firm?

9 A. Yes, sir, immediately.

10 Q. And that was -- did that come out of
11 your Palmetto State Bank account?

12 A. I borrowed the money.

13 Q. Okay.

14 A. I have a loan right now I'm paying back
15 for it.

16 Q. Okay. With Palmetto State Bank?

17 A. Yes, sir.

18 Q. When you were first contacted about
19 serving as the PR for the Estate of Gloria
20 Satterfield, I think you said it was right before
21 Thanksgiving and you were out of the office; is
22 that right?

23 A. Yes, sir.

24 Q. So it was a call you got on your cell
25 phone?

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1 A. Yes, sir.

2 Q. And then I believe you told me 19 is one
3 that you had not seen until your first
4 deposition?

5 A. Yes, sir.

6 Q. Okay. And there's no signature by you
7 anywhere on this document, right?

8 A. No.

9 Q. All right. I asked you a bunch of
10 questions about what Mr. Laffitte did or did not
11 tell you when you asked if you could serve as PR
12 for the Estate of Gloria Satterfield. I forgot
13 one.

14 Did he tell you that he had been asked
15 to serve as the PR for the estate?

16 A. He did not.

17 Q. Did he tell you -- I assume he didn't,
18 therefore, tell you why he was not serving as the
19 PR?

20 A. He did not.

21 Q. Okay. Another bit of cleanup, if we
22 could go back to -- which exhibit was this?

23 A. No. 3.

24 Q. Right there, No. 3. Just to clarify,
25 this withdrawal, you didn't approve this